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VIA ECF

January 22, 2024

Honorable Eric Komitee
United States District Court
Easter District of New York
225 Cadman Plaza East, Room 6G North
Brooklyn, New York 11201
New York, NY 10007

Re: **LETTER MOTION IN SUPPORT OF AN EXTENTION FOR DEFENDANTS**
Sarah Coombs Moreno et al. v. City of New York, et.al
Civil Action No: 22-cv-02234

Dear Judge Komitee:

Thank you for granting Plaintiffs the right to file their 4th Amended Complaint. As explained in our January 17, 2024, we apologize for the inadvertent miscalculation regarding the filing deadline due to the Martin Luther King, Jr. Holiday.

Nevertheless, we have agreed to allow counsel for Defendants the City of New York ("City") a two (2) week extension to respond, but now would like to request an additional 7- day extension so that the City's counsel will have additional time to review our "corrected" 4th Amended Complaint. We recently filed the correct version of the 4th Amended Complaint after later realizing that the wrong "version" of pleading was filed that continued to display as a "proposed" amendment. Due to this correction and due to other administrative issues that occurred as a result of the Clerk's office incorrectly halting all filings by us requiring that we pay another Pro Hoc Vice fee with a new motion to appear (which the clerk has now withdrawn as an error by the administration), we would like to give the City's counsel more time to respond to our corrected 4th Amended Complaint due to these additional administrative delays.

In summary, Plaintiffs request that the new deadline for the City to reply to the corrected 4th Amended Complaint be further extended and rescheduled to **February 13, 2024**. We hope that the Court can notify the City's counsel of this new date as soon as possible.

Also, we ask that the Court please approve a refund of the \$150 Pro Hoc fee we paid due to the mishap by the Clerk's office. Thank you for your time and attention to this request.

Respectfully Submitted,

/s/ Jo Saint-George, Esq.

Jo Saint-George, Esq.
Chief Legal Officer



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